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10 Attorney for:
11 HEATHER STANLEY

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13 UNITED STATES DISTRICT COURT
14 FOR THE EASTERN DISTRICT OF CALIFORNIA

15
16 UNITED STATES OF AMERICA,

Case No. 1:20-cr-00045 NONE-SKO

17 Plaintiff,

18 v.

19 HEATHER STANLEY,

20 Defendants.

STIPULATION AND ORDER TO MODIFY
TERMS AND CONDITIONS OF RELEASE

21 TO: THE CLERK OF THE UNITED STATES DISTRICT COURT, HONORABLE DALE A.
22 DROZD AND ANGELA SCOTT, ASSISTANT UNITED STATES ATTORNEY:

23 COMES NOW Defendant, HEATHER STANLEY, by and through her attorney of
record, DAVID A. TORRES hereby requesting that the conditions of defendant's release include
the following:

24 Defendant is to provide a detailed itinerary to the assigned Pretrial Services Officer which
shall include the location of where defendant will travel and the time frame of when defendant
wishes to travel.

25 Declaration:

- 26 1. On February 26, 2020 Ms. Stanley was arraigned on the Indictment.
27 2. A detention hearing was held, and Ms. Stanley was ordered released upon conditions
set forth by the Court.
28 3. Part of Ms. Stanley's terms of release included a travel restriction, specifically section

(7)(c), "travel restricted to the State of California, unless otherwise approved in advance by PSO, and you may travel within the State of Nevada if approved for residency, by PSO."

4. Ms. Stanley respectfully requests the court allow her to travel within the United States so long as approved by the PSO. Additionally, she would be required to inform the PSO, prior to travel, of her time frame of travel and the locations where she will be visiting.

IT IS SO STIPULATED.

DATED: 3/17/20

Respectfully Submitted,
/s/ **David A Torres**
DAVID A. TORRES
Attorney for Defendant
HEATHER STANLEY

DATED: 3/17/20

/s/Angela Scott
ANGELA SCOTT
Assistant U.S. Attorney

ORDER

The Court DENIES the request to modify conditions of release and sets a bail review hearing for Friday, March 20, 2020 at 2:00 p.m. to address the issues in this stipulation. In light of the restrictions on entering the Courthouse, and General Orders 610 and 611, the government's attorney and the defense counsel are encouraged to appear by telephone for the hearing in this matter with each party using the following dial-in number and access code: **dial-in number 1-877-411-9748; access code 3219139.** To the extent possible, defense counsel is encouraged to waive their client's appearance. The Court will allow in-court oral waiver of a defendant's appearance provided counsel informs Esther Valdez at 559-499-5788 no later than noon the day before the hearing.

IT IS SO ORDERED.

Dated: **March 18, 2020**

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE